



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

NOV 9 2004

Mr. Michael Jones
Senior Packaging Engineering
FMC Corporation
APG Operations
119 Roselane Terrace
Syracuse, NY 13219

Ref. No.: 04-0250

Dear Mr. Jones:

This is in response to your November 5, 2004 letter requesting clarification regarding the requalification requirements for DOT 57 portable tanks under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if periodic thickness testing is required for DOT 57 portable tanks.

The answer is no. The requalification requirements for DOT 57 portable tanks are found in Part 180, Subpart G. Section 180.605(c)(3) specifies that DOT 57 portable tanks must receive a periodic inspection and pressure test at least once every 2.5 years. The inspection and pressure test requirements are specified in § 180.605(g) and (h)(1), respectively.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



040250

180.605

Satterthwaite

October 18, 2004

§ 180.605
Retesting Portable Tanks
04-0250

FMC Agricultural Products
119 Roselane Terrace
Syracuse, NY 13219

U.S. Department of Transportation
Research and Special Programs Administration
Office of Hazardous Materials Standards
400 7th Street, S.W.
Washington, DC 20590-0001
Attn: Mr. Edward Mazzullo

Mr Mazzullo,

This is a request for clarification of sections 173.32 and 180.352 of the U.S. Hazardous Materials Regulations (HMR) contained in Title 49 of the U.S. Code of Federal Regulations (49 CFR). In specific I am requesting clarification around the periodic retesting requirements for DOT 57 tanks?

It is my understanding that every 2-1/2 years all IBCs and DOT 57 portable containers must pass an external visual inspection in addition to a 20kPa (3 psig) air pressure test. The clarification I am requesting is if the DOT 57 containers are required to be "Thickness Tested" or are they exempt from this requirement as described in 173.32 3 (c)?

Sincerely,

Michael Jones

Michael Jones
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